



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

March 7, 2011

Charlie Stenvall, Project Leader
Willapa National Wildlife Refuge Complex
3888 SR 101
Illwaco, Washington 98624-9707

Re: U.S. Environmental Protection Agency (EPA) comments for the Willapa National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/DEIS). EPA Project Number: 08-026-FWS

Dear Mr. Stenvall:

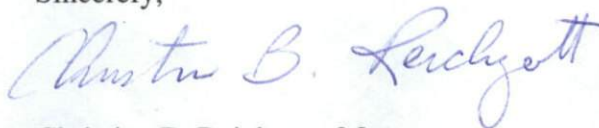
This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an LO (Lack of Objections) rating to the CCP/DEIS. A copy of the EPA rating system is enclosed.

EPA supports the Preferred Alternative (Alternative 2) because we believe Alternative 2 presents the best approach for protecting human health and the environment. We especially support Alternative 2's additions to estuarine habitat (.2 acre of open water, 11 acres of intertidal flats, and 749 acres of salt marsh) because we agree with the DEIS's conclusion that such additions, combined with other ongoing programs to restore/improve estuarine habitat in the coastal region, would represent significant positive cumulative effects for fish and wildlife. In particular, we agree that Alternative 2's estuarine habitat additions would result in significant positive effects because they would:

- offset historical losses of estuarine habitat in Willapa Bay (estimated as a 64% loss of estuarine wetlands (DEIS, 4-92));
- create additional opportunities for eelgrass to colonize restored intertidal mudflats;
- benefit juvenile salmon and waterbirds such as the Pacific brant;
- likely lead to increased duck and the same or increased goose usage;
- increase habitat for shellfish, and, benthic and other invertebrates; and,
- reduce or eliminate highly invasive reed canarygrass and tussock infestations.

We appreciate your efforts to protect and restore native ecosystem processes and if you have any questions or concerns please contact Erik Peterson of my staff at, (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures:

EPA Rating System for Draft Environmental Impact Statements



**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987